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August 16, 2021

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

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**Re: *United States v. Joel Fermin***  
**21 Cr. 87 (ER)**


**MEMO ENDORSED**

Dear Judge Ramos:

Please recall that I represent Mr. Joel Fermin in his defense of the above-referenced matter. Mr. Fermin is presently scheduled to appear before Your Honor on August 19, 2021 at 10:30 a.m. for a status conference. At this time, the parties are engaging in extensive, good-faith negotiations towards a possible pretrial resolution of this matter. Therefore, I write to respectfully request that Your Honor grant a 45-day adjournment of the status conference in order to permit the parties to continue these ongoing negotiations. This is the defense's second adjournment request in this matter. We have conferred with A.U.S.A. Kedar Bhatia, and the Government consents to this request.

The defense has no objection to the exclusion of time under the Speedy Trial Act. Thank you for your consideration.

Respectfully submitted,


  
Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Kedar Bhatia (via ECF)  
Mr. Joel Fermin (via mail)

The August 19 status conference is adjourned to September 14, 2021 at 4:00 p.m. at the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York 10007, Courtroom 619.

SO ORDERED.

  
Edgardo Ramos, U.S.D.J  
Dated: 8/18/2021  
New York, New York